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to Christiana Bank & Trust Company, as Trustee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

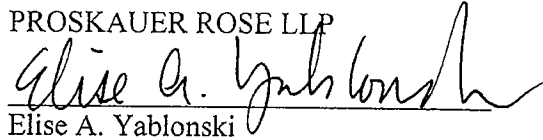|	
AMERICAN GENERAL LIFE INSURANCE COMPANY, 　　　　　　　Plaintiff, vs. STANLEY MANN, THE STANLEY MANN 2007 INSURANCE TRUST, CHRISTIANA BANK & TRUST CO., as Trustee, and JOHN DOES 1-10, 　　　　　　　Defendants.	Misc. No. _____ 　　　　M 08-85 (Case Pending in the District of Delaware) (CA No. 09-434-GMS) **NOTICE OF MOTION TO COMPEL** **COMPLIANCE WITH SUBPOENAS**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Elise A. Yablonski dated December 30, 2010, and exhibits thereto, the Stanley Mann 2007 Insurance Trust and Wilmington Savings Fund Society (as successor-in-interest to Christiana Bank & Trust Company), as Trustee, through their undersigned counsel, will move this Court, at the Courthouse, 500 Pearl Street, New York, NY, in the courtroom of the District Judge assigned to Part I, on the 18th day of January, 2011 at 1 p.m. or as soon thereafter as counsel may be heard, for an order: 1) compelling Stephen Mostecak to appear for deposition and produce documents in accordance with the subpoena duly served upon him on November 26, 2010; 2) compelling

American International Group to produce documents in accordance with the subpoena duly served upon it on November 29, 2010; and 3) granting such other and further relief as the Court may deem just and proper.   The legal and factual bases for this motion are set forth in the accompanying Declaration of Elise A. Yablonski.

Dated: December 30, 2010

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